

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

|  |   |                            |
|--|---|----------------------------|
| GEORGE BOYD, et al.                      | ) |                            |
| <i>individually and on behalf of all</i> | ) |                            |
| <i>others similarly situated,</i>        | ) |                            |
|  | ) |                            |
| Plaintiffs,                              | ) |                            |
|  | ) | Civil Action No. 3:12cv700 |
| v.                                       | ) |                            |
|  | ) |                            |
| LAW OFFICES OF SHAPIRO, BROWN, &         | ) |                            |
| ALT, LLP, et al.,                        | ) |                            |
|  | ) |                            |
| Defendants.                              | ) |                            |

**DECLARATION OF MOHAMMAD MOHASSEL**

I, Mohammad Mohassel, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am currently employed at car dealership. My typical work hours are 9-4, Monday through Friday. Although I am able to take leave from work, it would be difficult for me to get enough time off of work to travel to the Norfolk Division in order to litigate my case.

2. The property that I owned and forms the basis for this lawsuit against the Defendants is located at 609 Eanes Road, Kenbridge Virginia 23944, which is located in Lunenburg County and in the Richmond Division of the Eastern District of Virginia.

3. If this case were to be transferred to the Norfolk Division, it would cause significant hardships and inconveniences for me. Not only is the Norfolk Division three and a half hours away from my home and job, but it would be difficult for me to take enough time off of work in order to travel to the Norfolk Division. Because of the distance and the traffic in the Hampton Roads Bridge Tunnel, I would probably have to make the trip to Norfolk over the course of two days.

4. The Richmond Division is much closer to my home and my job. The federal courthouse in Richmond is located just under two hours away from my home. I could easily make this trip in one day.

5. I have two children, ages 14 and 16 and they are both in school. If I had to travel to the Norfolk Division in order to litigate this case, I would have to find someone to watch them overnight so that I could make the almost seven hour round trip drive to Norfolk.

6. I also intend to call several witnesses located in the Richmond Division to support my case against the Defendants.

7. For example, I intend to seek the testimony of a Loan Processing Services representative to support my claims. LPS has an office located in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

8. Additionally, many of the documents pertaining to my foreclosure are located in the Richmond Division, including the land records pertaining to my foreclosure, which are located at the Lunenburg County Circuit Court.

9. It is my preference that this case remains in the Richmond Division so that I can avoid these hardships.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 1-28-13



MOHAMMAD MOHASSEL